

STATE OF SOUTH CAROLINA

(Caption of Case)

State Universal Service Support of Basic Local
Service Included In a Bundled Service Offering or
Contract Offering

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2009 - 326 - C

(Please type or print)

Submitted by: Burnet R. Maybank III

SC Bar Number: 3699

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Fax: 803-253-8277

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Columbia, SC 29201

Other:

Email: bmaybank@nexsenpruet.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input checked="" type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input checked="" type="checkbox"/> Other: Cover Sheet
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

Print Form

Reset Form

September 3, 2009

Burnet R. Maybank, III
Member
Admitted in SC

VIA ELECTRONIC FILING

Public Service Commission of South Carolina
Docketing Department
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

**Re: Docket Number 2009-326-C – State Universal Service Support of Basic
Local Service Included in a Bundled Service Offering or Contract
Offering**

Charleston

Charlotte

Columbia

Greensboro

Greenville

Hilton Head

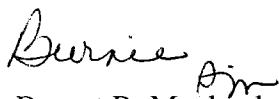
Myrtle Beach

Raleigh

Dear Ladies and Gentlemen:

Enclosed for filing please find Notice of Motion and Motion for Protective Order and Request for Confidential Treatment in the above-referenced matter.

Very truly yours,


Burnet R. Maybank, III

sjn

Enclosures

cc: Nanette S. Edwards, Esq.
Jayne Eve
James White
All Parties of Record

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2009-326-C

IN RE:

**State Universal Service Support of Basic
Local Service Included in a Bundled Service
Contract Offering**

**Notice of Motion and Motion for
Protective Order and Request for
Confidential Treatment**

Burnet R. Maybank III, Attorney for Windstream South Carolina, LLC (Windstream) moves the Public Service Commission (PSC) for a Protective Order regarding responses to Data Requests propounded by the South Carolina Cable Association, CompSouth, TW Telecom of South Carolina, LLC, and Nuvox Communications Incorporated on the grounds that such responses contain confidential and proprietary information. Specifically, the data requests seek information concerning the number of residential USF access lines included in bundled service offerings, the number of single-line business USF access lines included in bundled service offerings, the number of residential USF access lines included as part of “contract offerings,” and the number of single-line business USF access lines included as part of “contract offerings.” All such information is confidential and proprietary. The Commission should issue an order limiting the dissemination of such information to only those persons associated with the Parties who have a need to know for the strict purposes of this proceeding and preventing its disclosure to those

persons involved in selling, marketing or otherwise using such information to compete with Windstream.

WHEREFORE, the Movant, Windstream, prays that this Commission issue an order limiting the dissemination of the information sought the data requests to those persons associated with the Parties who have a need to know for the strict purposes of this proceeding and preventing its disclosure to those persons involved in selling, marketing or otherwise using such information to compete with Windstream.



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Attorneys for
Windstream South Carolina, LLC

September 3, 2009
Columbia, South Carolina

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

Docket Number 2009-326-C

**State Universal Service Support of Basic Local Service Included In a Bundled
Service Offering or Contract Offering**

CERTIFICATE OF SERVICE

I, Shirley J. Neal, an employee of Nexsen Pruet, LLC, hereby certify that on this 3rd day of September, 2009, served a copy of the attached Notice of Motion and Motion for Protective Order and Request for Confidential Treatment in the above-referenced matter to the persons below by causing said copy to be sent by regular mail and/or email as shown below:

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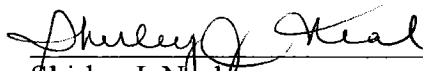
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Shirley J. Neal